

**Written Testimony for Mayor Jim Suttle
Water Resources Subcommittee - House Transportation and Infrastructure Committee
December 14, 2011**

I would like to thank the Chairman and this committee for inviting me. My name is Jim Suttle and I've been the Mayor of Omaha, Nebraska since 2009. I also served as Vice Chair of the Board and Executive Vice President for HDR Engineering, I was the Public Works Director for Omaha, and I am a licensed professional engineer.

I am testifying on behalf of The U.S. Conference of Mayors. The Conference of Mayors is the official non-partisan organization representing cities with populations of 30,000 or more through its chief elected official, the Mayor. The Conference of Mayors was created in 1932 as a result of the Great Depression. A time that is markedly similar to today – times with high unemployment and tough economic conditions.

At the Conference of Mayors, I serve as an active member of the Mayors Water Council and have been part of the discussions that led to EPA's Integrated Planning Memorandum.

My background gives me a unique perspective to comment on the matter before this subcommittee today.

I am here today to give you some background as to why the Mayors of this nation are concerned about Combined and Sanitary Sewer Overflow (CSO/SSO) solutions and other unfunded water related mandates, what we hope EPA's Integrated Planning Policy memo will address, and what we think the Congressional role should be regarding the Integrated Planning Policy. In particular I would like to address the following issues - Affordability, Green solutions, New technology, Grant Funding, and suggesting that the current Enforcement Process should be replaced with a permitting process instead.

It should be clear from the start that the USCM fully recognizes that EPA's issuance of policy directives to their Regional Offices on green infrastructure and Integrated Planning is directly responsive to requests for the same from the USCM. Further, the Integrated Planning Policy memo is recognized as a landmark departure from the traditional regulatory model of rule-by-silo approach. The USCM here suggests that the successful implementation of this policy approach requires local, state and federal government offices and officials to take equal responsibility to make it happen.

Background

Several dozen member cities urged The United States Conference of Mayors (USCM) in 2009 to review the U. S. Environmental Protection Agency (EPA) and U. S. Department of Justice (DOJ) enforcement actions regarding Combined Sewer Overflows and/or Sanitary Sewer Overflows (CSO/SSO). These, and additional member cities, expressed grave concern that the enforcement actions, which trigger consent agreement negotiations, and, ultimately Court ordered consent decrees, typically result in overly costly, overly prescriptive long term control plans (LTCP).

These plans most often require cities holding National Pollution Discharge Elimination System (NPDES) permits to make major capital investments and commit to significant recurring annual operating and maintenance costs.

In 2009 the USCM made a request to EPA and DOJ to enter into a dialogue to review what cities are experiencing in the EPA Regions via consent agreement negotiations. In October of 2010 the USCM submitted a set of policy recommendations focusing on areas of flexibility in existing law that could improve the consent agreement process and provide some relief to cities without compromising water quality standards or goals. Prominent among the recommendations was a request for EPA Headquarters to issue policy guidance to the Regional Agency Offices to work with cities to incorporate flexibility. After several more meetings EPA requested that Agency and city technical staff meet to discuss what cities find objectionable about the consent negotiation process; and this meeting was held in Washington, DC on March 22, 2011.

In April of 2011 EPA issued policy guidance to the Regions to work with cities, wastewater utilities and other stakeholders to try to find ways to incorporate green infrastructure into LTCPs. And, on October 28, 2011 EPA issued the Integrated Planning policy statement to the Regions. Both of these policy documents are directly responsive to the USCM request. The USCM applauds and appreciates the EPA's actions. It is, from the USCM's perspective, a landmark departure from the EPA's "normal" approach to the regulated community. It has great potential, but, it is currently statement of policy intention, and will not provide the requested flexibility until EPA completes and adopts the policy implementation framework (which they are in the process of developing), and it is tested in the field at the EPA Regional enforcement and permit writer's level.

Congress can play an important oversight role by following this policy approach as it unfolds. If it turns out that we cannot accomplish this goal administratively, we will request that Congress to act legislatively. But a legislative remedy would be premature at this time.

Critical Concerns

50 PERCENT GRANT FUNDING FROM THE FEDERAL GOVERNMENT

The mounting cost of rehabilitating and expanding wastewater systems in the United States is challenging the budgets of our cities and our ratepayers; and straining the limits of long term debt and our ability to borrow money. Local government spent over \$103 billion on water and wastewater in 2009, (see Table A). \$46.4 billion of the \$103 billion was spent on wastewater in 2009; and \$18.7 billion of the \$46.4 billion was in the form of capital investments.

Local government finances mimic both the federal budget deficit and the national debt situation, (Table A). Local governments across the nation are spending more money than they raise in revenues, (deficit spending). All local government spending in 2009 (the latest data of record from the US Census) exceeded revenues by 15 percent. Local government in some states (i.e., California, Maryland, Massachusetts, Michigan, New York) spent 20 percent or more than revenues, while some states exceeded 30 percent of revenues (i.e., District of Columbia, Illinois).

Long term debt of local governments has experienced phenomenal growth of over 80 percent between 2000 and 2009, and for the latest year of record, 2009, long term debt was \$1.6 trillion. In some states the growth in debt is remarkable: Indiana 131%; Missouri 144%; Tennessee 111%; Texas 143%.

The recent recession does not fully explain the deficit spending or the growth in long term debt since its effects are more likely to be felt in 2010 and 2011. These trends send a message that deficit spending and growth in debt are systemic trends among local government, and suggest that they are likely not sustainable practices over the long run.

Similarly, spending on wastewater and water supply has also experienced significant growth. In 2009 over \$103 billion was spent on these categories; a 65 percent increase over spending in the year 2000. Notable increases are reported by local government in: New York (96.6%); Hawaii (107.6%); and, Washington (119.3%). Spending on wastewater and water supply increased by 65.4 percent, while national GDP increased by about 40 percent from 2000 to 2009.

Given the current economic downturn and high unemployment it is not reasonable to assume that ratepayers can support additional significant increases in water related spending. Congress can help cities by providing 50 percent grants for capital investments to meet federal mandates. A 50 percent grant would cover less than 25 percent of overall spending for compliance because cities would provide the other 50 percent of capital investment, but 100 percent of operations and maintenance cost which are roughly 60 percent of overall cost today.

If Congress does not or will not provide the sorely needed grants they should make every effort to support EPA's Integrated Planning policy to lessen the cost burden of federal mandates by exercising the flexibility allowed by the Clean Water Act.

AFFORDABILITY

If local government could afford to invest in LTCPs as designed by consent agreements there would be no need for the Integrated Planning policy or this hearing in the Subcommittee. The information presented above suggests that we are on an unsustainable financial path and cannot meet the mandates. Therefore, the critical discussion on water related unfunded mandates is one of "affordability".

Aside from recent exceptions where EPA has been more flexible with regard to green infrastructure as part of an LTCP, and some extended compliance schedules, the trend can be described as the 4-2-20 model:

- 4 overflows or less in a year;
- 2 percent of Median Household Income (MHI) as a target for local spending on a long term control plan (LTCP); and,
- 20 years or less as a compliance schedule timeframe.

This approach locks local government into overly costly, overly prescriptive and overly restrictive plans. There is no room, under this approach, for innovation and/or cost efficiencies.

Nor is the requirement to reduce overflows to 4 or less a year based on science- it is an administratively arbitrary determination.

The 2 percent of MHI as a financial capability target is vague, and does not capture the disproportionate impact on households of low and moderate income. All public revenues come from the same ratepayer's pockets whether they are households or businesses. Adding unnecessary rate increases are no longer a reasonable option. Mayors are concerned about the overall burden on those people and businesses, and as rates increase, they pose a greater burden. Merely assessing the additional impact of rate increases on MHI from a CSO enforcement action does not address the overall burden.

Some important financial considerations:

a) Rates have a disproportionate impact on households, particularly low and medium-income households.

- A household with a \$25,000 annual income that pays \$1,000 a year for water and sewer bills allocates 4 percent of that income for this purpose.
- A \$250 increase in rates raises household spending to 5 percent of income.
- A \$500 a year increase in rates raises household spending to 6 percent.

EPA and Congress should no longer ignore the regressive financial impacts caused by unfunded mandates on low and moderate income households.

b) Businesses and other organizations are often significant ratepayers because they are large volume users of municipal wastewater services.

For industrial users wastewater is a variable cost of doing business. History has demonstrated that industry is footloose, and will leave a community to seek favorable water and sewer rates. If one or more of these industrial ratepayers flee, local government must reapportion rates accordingly. This means that businesses that remain as well as households pay a larger share. This in turn can cause more businesses to flee, and a reduction in employment opportunities makes a city a less desirable place to live. It will also result in a greater cost share allocation to households.

Another potentially undesirable outcome is that industry that flees a city could locate in surrounding jurisdiction(s). While this may be advantageous for an industrial entity it increases sprawl and carbon footprint. Density of development is a solution to sprawl and increased carbon footprint.

NEW TECHNOLOGY

The trend in CSO/SSO consent agreements has resulted almost predominantly in gray infrastructure Long Term Control Plans. Only recently, and for a very short period, has EPA

been open to allowing cities to incorporate green infrastructure components in their legally binding consent agreements. With some notable exceptions the general rule is that a city is locked into a gray infrastructure control plan that is neither imaginative nor cost-efficient.

While each plan has many components, the intent of the plan is to capture and retain very large volumes of water to prevent it from entering a lake, stream or estuary until it is treated to remove contaminants. This can be accomplished a number of ways, but the way that EPA enforcement and permit authorities prefer, as demonstrated by the agreements they approve, is where the permit holder conveys stormwater and sewer overflows into large retention basins or miles long tunnels. When overflows subside, the water is then pumped at great cost and utilization of electricity that increases carbon emissions.

Locking into a gray infrastructure solution is very expensive, and once you do that there is no incentive for cities to consider employing innovative technology that might be better and cheaper to install and operate, or that might have a lower energy-carbon emission.

This new technology dilemma has been described as follows. It's like purchasing a mobile phone and locking in a mobile phone contract for 10 to 20 years knowing full well that the technology will rapidly evolve, but the city will be stuck with a costly arrangement and obsolete technology.

The Integrated Planning approach can provide flexibility by locking in long term water quality goals and using the wastewater permitting mechanism to adjust the plan over time to take advantage of green infrastructure and technology advances.

GREEN INFRASTRUCTURE

The Conference of Mayors assembled experts on green infrastructure with city wastewater managers to review its potential to achieve water quality standards at a lower cost than gray infrastructure. This was confirmed by several expert dialogues in several meetings held over a one and half year period. On October 27, 2010 the Conference of Mayors submitted policy recommendations to EPA, and also requested that EPA issue guidance to its Regional Offices to not only allow, but also promote the use of green infrastructure.

In April of 2011 EPA issued Guidance to its Regional Offices to both allow and promote green infrastructure in CSO/SSO consent agreements. We thank EPA for taking this step; and we recognize that several recent consent agreements incorporates green infrastructure as part of their Long Term Control Plans. We look forward to working with EPA to implement and expand this policy.

ACHIEVING WATER QUALITY GOALS IS BETTER ACCOMPLISHED THROUGH THE PERMITTING PROCESS RATHER THAN ENFORCEMENT VIA CONSENT DECREES

A list of local governments who are subject to EPA's enforcement strategy related just to CSOs is listed in Appendix B. We do not have a reliable list of local governments subject to SSO enforcement.

Every morning mayors and responsible local government officials wake up as "criminals" in the United States by definition of EPA's enforcement strategy. It doesn't matter if the mayor was elected 10 years ago or took office yesterday; they are, by definition "criminals". Why? Because their wastewater systems have sewer overflows, primarily as a result of a storm event- a "natural act", often referred to in contracts as an uncontrollable circumstance

The overflow is itself a violation of the Clean Water Act, therefore the Mayor responsible for the system is not in compliance with the Clean Water Act. If only Mayors had the money required to prevent sewer overflows they could escape this automatic violation of the Clean Water Act. But they do not have the resources to do so.

The chosen enforcement mechanism is an extraordinary legal remedy usually reserved for the most intractable cases of egregious violations of the Clean Water Act. But EPA has set it as the default regulatory mechanism. Part of their reasoning is that it saves the permit holder (in this case a local government) from the dire consequences of a citizen suit.

Using enforcement actions as the default option sends the message via the mass media to our citizens that mayors are not trustworthy, and that they condone water pollution. It is hard to identify any other federal administrative policy that has done so much to damage the intergovernmental partnership between federal and local elected officials and it should be ended immediately.

EPA can accomplish the same water quality goals through the permitting process, and by helping states and local government develop watershed water quality plans to protect this precious resource. If the threat of citizen suits circumvents remedies afforded by the permitting process, then the Clean Water Act has procedural deficiencies that are terribly flawed and need to be corrected.

What Congress Can Do

As I mentioned earlier, the Integrated Planning policy still needs to be developed by the Agency and implemented in the field. If this approach does not create a path to help cities allocate limited resources for the right environmental outcome – then, it will have accomplished nothing.

We need Congress to provide oversight and to remember that EPA has this authority because of the way the Clean Water Act was written. We need a paradigm shift where together – local, state, and the federal officials exercise practical leadership and work together to determine what our environmental and spending priorities should be. We owe our constituents with the most science-based, cost-efficient methods to provide them with a safe and clean environment that is economically sustainable.

The Conference of Mayors is working on a set of recommendations to implement the Integrated Planning Policy. The Conference plans to provide these recommendations to the EPA in the near

future, and they would like to send them to the subcommittee at that time. Of particular note is that we would like Drinking Water Provisions to be included in an Integrated Plan, if a local government wants to include it.

Thank you again for this opportunity to address you.

Table A: Local Government Finances and Water and Wastewater Spending

Category	Expenditures For Every Dollar of Revenue 2009 (\$)	Change in Long Term Debt 2009 vs 2000 (%)	Wastewater and Water Supply Spending 2009 (\$ thou)	Change in Wastewater and Water Supply Spending 2009 vs 2000 (%)
United States¹	1.15	81.76	103,453,483	65.4
Alaska	1.12	17.86	208,078	13.3
Arkansas	1.09	68.76	714,627	88.0
California	1.27	98.17	20,670,260	89.2
District of Columbia	1.31	91.44	506,621	-10.0
Florida	1.11	79.57	6,566,127	65.3
Hawaii	1.08	98.23	662,341	107.6
Illinois	1.32	83.84	3,564,791	32.8
Indiana	1.00	131.42	1,580,761	81.9
Louisiana	1.03	63.00	1,019,521	70.4
Maryland	1.22	22.50	1,145,049	24.7
Massachusetts	1.20	53.79	1,550,883	42.1
Michigan	1.26	72.33	3,662,040	35.3
Minnesota	1.10	53.38	1,306,531	31.3
Missouri	1.22	144.86	1,516,238	58.3
New York	1.26	75.96	6,802,296	96.6
Ohio	1.03	93.91	3,722,271	52.3
Oklahoma	1.01	49.41	981,284	55.2
Pennsylvania	1.08	38.56	2,816,532	25.2
Tennessee	1.08	111.80	1,663,679	35.7
Texas	1.15	143.34	8,569,326	80.2
Washington	1.04	56.53	3,045,259	119.3
West Virginia	1.01	-0.80	391,013	35.2
Wisconsin	1.13	43.33	1,407,606	39.0

¹ Interpretation: Local government in the USA spent \$1.15 for every \$1 raised in revenue; long term debt rose 811.76% from 200 to 2009; wastewater and water supply spending in 2009 by local government was \$103.4 billion; and, wastewater and water supply spending increased by 65.4 % in 2009 from a base year of 2000.

APPENDIX A

Letter from the USCM, NLC and NACO thanking EPA for Integrated permitting

APPENDIX B

List of local governments identified for possible enforcement actions.

SOURCE: www.epa.gov/npdes
 United States Environmental Protection Agency
 Office of Water (4203)
 Washington, D.C. 20460 www.epa.gov/npdes

December 2001 PA 833-R-01-003

Report to Congress

Implementation and Enforcement of the Combined Sewer Overflow Control Policy

Appendix D of EPA Report
 (Listed Alpha by State)

EPA	Reg	State	Zip	Entity Name	Number of CSOs
10	Alaska	AK	0023213	Juneau-Douglas WWTP	3
9	California	CA	0037681	Oceanside WPCP and Westside Wet Weather CSO System	7
9	California	CA	0038610	Bayside Wet Weather Facilities WPCP	28
9	California	CA	0079111	Sacramento Regional County S.D.	6
3	District of Columbia	DC	0021199	District of Columbia WWTP	60
5	Illinois	IL	0044911	Village of Schiller Park CSO	1
5	Illinois	IL	0045012	Chicago CSOs	231
5	Illinois	IL	0030660	City of Peru STP	23
5	Illinois	IL	0029424	LaSalle WWTP	3
5	Illinois	IL	0029467	Lawrenceville STP	4
5	Illinois	IL	0029564	Lincoln STP	3
5	Illinois	IL	0029831	Mattoon WWTP	5
5	Illinois	IL	0029874	City of Metropolis STP	1
5	Illinois	IL	0030015	Morton STP	2 2
5	Illinois	IL	0030384	Ottawa STP	14
5	Illinois	IL	0030503	Quincy STP	7
5	Illinois	IL	0030783	Rock Island	5
5	Illinois	IL	0031216	Spring Valley WWTP	9
5	Illinois	IL	0031356	Taylorville S.D.	STP 2
5	Illinois	IL	0031852	Wood River STP	1
5	Illinois	IL	0033472	East St. Louis CSOs	2
5	Illinois	IL	0034495	Pekin STP	1 4

5 Illinois IL0030457 Pontiac STP 5
5 Illinois IL0068365 Marshall STP 3
5 Illinois IL0035084 City of Casey STP 1
5 Illinois IL0043061 Prophetstown STP 3
5 Illinois IL0037818 Minonk STP 3
5 Illinois IL0023272 Milford STP 4
5 Illinois IL0023281 Gibson City STP 3
5 Illinois IL0023825 Cairo STP 3
5 Illinois IL0028053 MWRDGC Stickney, West-Southwest STP 19
5 Illinois IL0028061 MWRDGC Calumet Water Reclamation Plant 15
5 Illinois IL0028088 MWRDGC- Northside Water Reclamation Plant 9
5 Illinois IL0028231 Cowden STP 2
5 Illinois IL0028321 S.D. of Decatur Main STP 4
5 Illinois IL0028622 Effingham STP 4
5 Illinois IL0028657 Fox River WRD-South STP 16
5 Illinois IL0023388 Havana STP 2
5 Illinois IL0027464 City of Alton STP 6
5 Illinois IL0027839 Canton-West STP 4
5 Illinois IL0027731 Bloomington/Normal WRD/STP 11
5 Illinois IL0024996 City of Oglesby STP 7
5 Illinois IL0025135 Beardstown S.D. 1
5 Illinois IL0026450 Dixon STP 9
5 Illinois IL0027367 Addison 3
5 Illinois IL0047741 MWRDGC James C. Kire WRP 1
5 Illinois IL0021253 Monmouth Main WWTP 7
5 Illinois IL0021377 Paris STP 2
5 Illinois IL0021601 Fairbury STP 12
5 Illinois IL0021661 Jacksonville STP 3
5 Illinois IL0021792 Wenona WWTP 2
5 Illinois IL0021873 City of Belleville STP #1 18
5 Illinois IL0021890 Shelbyville STP 3
5 Illinois IL0020818 Fox Metro Water Reclamation District 1
5 Illinois IL0021113 City of Morris STP 6
5 Illinois IL0021059 Marseilles STP 2
5 Illinois IL0020184 City of Oregon STP 10
5 Illinois IL0020621 Litchfield STP 2
5 Illinois IL0023141 Galesburg Sanitary District 41
5 Illinois IL0022462 Farmer City STP 3
5 Illinois IL0022322 City of Georgetown STP 1
5 Illinois IL0022331 Granville STP 4
5 Illinois IL0022519 City of Joliet-Eastside STP 12
5 Illinois IL0022543 City of Batavia WWTF 1
5 Illinois IL0022675 Carlinville STP 2
5 Illinois IL0022161 Watseka STP 7
5 Illinois IL0021971 Sugar Creek STP 3
5 Illinois IL0021989 Spring Creek STP 7

5 Illinois IL0022004 City of Streator STP 17
5 Illinois IL0052426 Village of Dolton CSOs 3
5 Illinois IL0052469 Village of Melrose Park CSO 1
5 Illinois IL0044920 Village of River Grove CSO 6
5 Illinois IL0044890 Brookfield CSOs 7
5 Illinois IL0052451 Lincolnwood CSOs 2
5 Illinois IL0052434 Skokie CSOs 2
5 Illinois IL0044881 City of Calumet City CSOs 7
5 Illinois IL0052418 Summit CSOs 4
5 Illinois IL0044954 Village of Lyons CSOs 3
5 Illinois IL0052442 City of Blue Island CSOs 4
5 Illinois IL0045080 City of Harvey CSOs 7
5 Illinois IL0037800 City of Peoria CSOs 18
5 Illinois IL0036536 City of Evanston CSOs 14
5 Illinois IL0033618 Village of Villa Park CSOs 4
5 Illinois IL0033588 LaGrange Park CSOs 3
5 Illinois IL0028592 Metro East S.D. CSOs 4
5 Illinois IL0047147 Village of Maywood CSOs 8
5 Illinois IL0021423 Village of Hartford CSO 1
5 Illinois IL0046795 Village of River Forest CSOs 4
5 Illinois IL0044733 Park Ridge CSOs 4
5 Illinois IL0029416 Lansing CSO 1
5 Illinois IL0048518 Aurora CSOs 15
5 Illinois IL0045039 Village of Western Springs CSOs 3
5 Illinois IL0045047 Village of Arlington Heights CSO 1
5 Illinois IL0045055 Village of South Holland CSOs 4
5 Illinois IL0045063 Village of Calumet Park CSO 1
5 Illinois IL0045071 Village of North Riverside CSOs 2
5 Illinois IL0044725 Dixmoor CSO 1
5 Illinois IL0037885 City of Markham CSO 1
5 Illinois IL0043133 Posen CSO 1
5 Illinois IL0045021 Riverside CSOs 5
5 Illinois IL0045098 Village of Riverdale CSOs 4
5 Illinois IL0045101 Village of Forest Park CSOs 2
5 Illinois IL0046175 Village of Morton Grove CSOs 2
5 Illinois IL0046418 Franklin Park CSOs 4
5 Illinois IL0042901 Village of Burnham CSOs 3
5 Illinois IL0039551 Village of Lemont CSOs 2
5 Illinois IL0044717 Des Plaines CSO 1
5 Illinois IL0066818 Hinsdale CSOs 4
5 Illinois IL0069981 Wilmette CSO 1
5 Illinois IL0070505 City of Elgin CSOs 12
5 Illinois IL0072001 Bloomington CSOs 6
5 Illinois IL0052477 Village of Niles CSOs 10

5 Indiana IN0020044 City of Alexandria WPCP 4
5 Indiana IN0020095 Portland Municipal STP 16
5 Indiana IN0020001 Ridgeville WWTP 3
5 Indiana IN0020109 Greenfield 0
5 Indiana IN0020117 Montpelier WWTP 4
5 Indiana IN0020125 Royal Center WWTP 2
5 Indiana IN0020133 Greensburg WWTP 3
5 Indiana IN0020168 City of Noblesville WWTP 7
5 Indiana IN0020176 Monticello Municipal STP 5
5 Indiana IN0020222 Attica 2
5 Indiana IN0025585 City of Marion WWTP 8
5 Indiana IN0025666 City of Madison WWTP 7
5 Indiana IN0025658 Washington Municipal STP 6
5 Indiana IN0021016 Tell City WWTP 5
5 Indiana IN0025640 City of Mishawaka WWTP 18
5 Indiana IN0021067 Rockport WWTP 1
5 Indiana IN0025631 Muncie Sanitary District 25
5 Indiana IN0025755 City of Goshen WWTP 6
5 Indiana IN0025607 City of Terre Haute POTW 10
5 Indiana IN0025763 City of Crownpoint WWTP 5
5 Indiana IN0025577 LaPorte Municipal STP 1
5 Indiana IN0025232 Town of Akron WWTP 3
5 Indiana IN0024821 West Lafayette WWTP 5
5 Indiana IN0024805 Warsaw WWTP 1
5 Indiana IN0024791 Warren 4
5 Indiana IN0024775 Wakarusa WWTP 6
5 Indiana IN0024741 City of Wabash WWTP 7
5 Indiana IN0024716 Veedersburg WWTP 4
5 Indiana IN0025615 William Edwin Ross WWTP 5
5 Indiana IN0032875 City of Kokomo Municipal Sanitation Utility 30
5 Indiana IN0039314 City of Decatur WWTP 4
5 Indiana IN0038318 Milford 1
5 Indiana IN0035696 Mt. Vernon WWTP 3
5 Indiana IN0033073 Evansville East WWTP 8
5 Indiana IN0032972 Civil Town of Speedway WWTP 3
5 Indiana IN0025674 City of Elkhart WWTP 39
5 Indiana IN0032956 Evansville Westside WWTP 15
5 Indiana IN0024554 City of Sullivan WWTP 5
5 Indiana IN0032719 Elwood 15
5 Indiana IN0032573 City of Columbus POTW 3
5 Indiana IN0032476 Anderson WWTP 19
5 Indiana IN0032468 Lafayette 13
5 Indiana IN0032336 Connersville 5
5 Indiana IN0032328 City of Peru WWTP 16
5 Indiana IN0032191 City of Fort Wayne WWTP 41
5 Indiana IN0031950 Indianapolis-South Port 0

5 Indiana IN0032964 City of Crawfordsville WWTP 2
5 Indiana IN0021628 Hartford City 17
5 Indiana IN0022683 Town of Crothersville WWTP 4
5 Indiana IN0022624 Columbia City WWTP 16
5 Indiana IN0022608 City of Clinton POTW 6
5 Indiana IN0022578 Chesterton Municipal STP 1
5 Indiana IN0022462 Butler 1
5 Indiana IN0022420 Boonville 1
5 Indiana IN0022411 City of Bluffton WWTP 1
5 Indiana IN0024660 Elden Kuehl Pollution Control Facility 2
5 Indiana IN0021652 Eaton 2
5 Indiana IN0022977 Gary WWTP 13
5 Indiana IN0021474 Tipton Municipal STP 8
5 Indiana IN0021466 Nappanee 13
5 Indiana IN0021385 City of Knox WWTP 1
5 Indiana IN0021369 Berne 3
5 Indiana IN0021342 Oxford WWTP 3
5 Indiana IN0021296 City of Angola WWTP 3
5 Indiana IN0021270 Rushville 3
5 Indiana IN0021245 Town of Brownsburg WWTP 2
5 Indiana IN0022144 Albion 2
5 Indiana IN0023604 City of Logansport WWTP 16
5 Indiana IN0024520 City of South Bend WWTP 42
5 Indiana IN0024473 City of Seymour WWTP 1
5 Indiana IN0024414 Rensselaer 16
5 Indiana IN0024406 Town of Redkey POTW 6
5 Indiana IN0024023 Paoli Municipal STP 8
5 Indiana IN0023914 City of New Castle WWTP 8
5 Indiana IN0023752 Michigan City 2
5 Indiana IN0022829 East Chicago S.D. 2
5 Indiana IN0023621 Lowell Municipal STP 1
5 Indiana IN0022934 Frankfort 1
5 Indiana IN0023582 Ligonier WWTP 6
5 Indiana IN0021105 Fairmount 16
5 Indiana IN0021202 Plainfield Municipal STP 5
5 Indiana IN0023302 Jeffersonville 16
5 Indiana IN0023183 Indianapolis-Belmont 133
5 Indiana IN0023132 City of Huntington WWTP 14
5 Indiana IN0023060 Hammond WWTP 20
5 Indiana IN0024562 Summitville 3
5 Indiana IN0023736 Markle WWTP 2
5 Indiana IN0020664 Avilla WWTP 4
5 Indiana IN0020672 Auburn WWTP 4
5 Indiana IN0020711 Waterloo Municipal STP 3
5 Indiana IN0020745 Ossian WWTP 6
5 Indiana IN0021211 Brazil Municipal STP 4

5 Indiana IN0020362 North Manchester STP 8
 5 Indiana IN0020427 Bremen WWTP 4
 5 Indiana IN0020451 North Vernon WWTP 2
 5 Indiana IN0020516 Winamac Municipal STP 5
 5 Indiana IN0020567 South Whitley Municipal STP 2
 5 Indiana IN0020656 City of Kendallville WWTP 1
 5 Indiana IN0020770 Middletown 4
 5 Indiana IN0020940 Remington Municipal STP 1
 5 Indiana IN0020877 North Judson Municipal STP 2
 5 Indiana IN0020907 Rossville 2
 5 Indiana IN0020958 Fortville WWTP 12
 5 Indiana IN0020991 Plymouth Municipal STP 10
 5 Indiana IN0020346 New Haven STP 4
 5 Indiana IN0022560 Chesterfield WWTP 3
 5 Indiana IN0050903 City of Aurora WW Collection System 2

3 Maryland MD0021601 Patapsco WWTP 2
 3 Maryland MD0021636 Cambridge WWTP 14
 3 Maryland MD0021598 Cumberland WWTP 16
 3 Maryland MD0021571 Salisbury WWTP 2
 3 Maryland MD0067423 Frostburg CSOs 15
 3 Maryland MD0067407 Allegany County CSOs 3
 3 Maryland MD0067547 LaVale CSOs 3
 3 Maryland MD0067384 Westernport Town 3

1 Massachusetts MA0100137 Montague WPCF 3
 1 Massachusetts MA0100455 South Hadley WWT 3
 1 Massachusetts MA0102351 MWRA, Deer Island WWTP 12
 1 Massachusetts MA0101630 Holyoke WPCF 15
 1 Massachusetts MA0101621 Haverhill WWTF 23
 1 Massachusetts MA0101508 Chicopee WPCF 40
 1 Massachusetts MA0101389 West Springfield 1
 1 Massachusetts MA0100382 Fall River WWTP 19
 1 Massachusetts MA0100986 Fitchburg WWTF 27
 1 Massachusetts MA0100447 Greater Lawrence Sanitary District 4
 1 Massachusetts MA0100897 Taunton WWTP 1
 1 Massachusetts MA0100781 New Bedford WWTF 35
 1 Massachusetts MA0100633 Lowell Regional WWU 9
 1 Massachusetts MA0100625 Gloucester WPCF 5
 1 Massachusetts MA0100552 Lynn WWTF 4
 1 Massachusetts MA0101168 Palmer WPCF 21
 1 Massachusetts MA0101338 Town of Ludlow CSOs 1
 1 Massachusetts MA0101192 Boston Water and Sewer Commission 37
 1 Massachusetts MA0101877 Chelsea 4
 1 Massachusetts MA0101974 City of Cambridge 11
 1 Massachusetts MA0101982 Somerville DPW 3

1 Massachusetts MA0102997 Worcester Combined Overflow Facility 1
 1 Massachusetts MA0103331 Springfield CSOs 32

5 Michigan MI0026069 Grand Rapids WWTP 19
 5 Michigan MI0020214 Norway WWTP 1
 5 Michigan MI0022802 Detroit WWTP 86
 5 Michigan MI0022284 Bay City WWTP 5
 5 Michigan MI0022152 Adrian WWTP 2
 5 Michigan MI0021695 Blissfield WWTP 2
 5 Michigan MI0021440 Wakefield WWSL 1
 5 Michigan MI0021083 Croswell WWTP 1
 5 Michigan MI0020656 Marysville WWTP 1
 5 Michigan MI0020362 Manistee WWTP 4
 5 Michigan MI0023001 Gladwin WWTP 1
 5 Michigan MI0020591 St. Clair WWTP 1
 5 Michigan MI0023973 Saginaw Township WWTP 1
 5 Michigan MI0025631 Menominee WWTP 1
 5 Michigan MI0025577 Saginaw WWTP 15
 5 Michigan MI0022853 East Lansing WWTP 2
 5 Michigan MI0022918 Essexville WWTP 1
 5 Michigan MI0023833 Port Huron WWTP 19
 5 Michigan MI0023701 Niles WWTP 8
 5 Michigan MI0023647 Mt. Clemens WWTP 1
 5 Michigan MI0023515 Manistique WWTP 1
 5 Michigan MI0023400 Lansing WWTP 32
 5 Michigan MI0023205 Iron Mountain-Kingsford WWTP 1
 5 Michigan MI0024058 Sault Ste Marie WWTP 7
 5 Michigan MI0026077 Grosse Pointe Farms CSO 7
 5 Michigan MI0025453 Martin RTB 2
 5 Michigan MI0025500 Milk River CSO 1
 5 Michigan MI0025534 Birmingham CSO 1
 5 Michigan MI0025542 Dearborn CSO 20
 5 Michigan MI0026085 Grosse Pointe Shores CSO 0
 5 Michigan MI0025585 Chapaton RTB 2
 5 Michigan MI0051811 Dearborn Heights CSO 1
 5 Michigan MI0051829 Redford Township CSO 1
 5 Michigan MI0051837 Inkster/Dearborn Heights CSO 1
 5 Michigan MI0051560 Wayne County/Livonia/Westland CSO 1
 5 Michigan MI0051551 Wayne County/ Livonia CSO 3
 5 Michigan MI0051462 Wayne County/ Inkster/Dearborn Heights CSO 2
 5 Michigan MI0026115 Oakland County SOCSDS 12 Towns RTF 1
 5 Michigan MI0026735 St. Joseph CSO 5
 5 Michigan MI0028819 River Rouge CSO 1
 5 Michigan MI0036072 Southgate/Wyandotte CSO RTF 2
 5 Michigan MI0037427 Oakland County-Acacia Park CSO 1
 5 Michigan MI0043982 North Houghton County W&SA CSO 2

5 Michigan MI0051802 Livonia CSO 1
 5 Michigan MI0048879 Crystal Falls CSO 2
 5 Michigan MI0051471 Wayne County/Inkster CSO 10
 5 Michigan MI0051489 Wayne County/Dearborn Heights CSO 7
 5 Michigan MI0051497 Wayne County/Westland CSO 1
 5 Michigan MI0051501 Wayne County/Westland/Wayne CSO 0
 5 Michigan MI0051535 Wayne County/Redford/ Livonia CSO 8
 5 Michigan MI0051543 Wayne County/Garden City/Westland CSO 0
 5 Michigan MI0048046 Bloomfield Village CSO 1

5 Minnesota MN0024571 Red Wing 1
 5 Minnesota MN0025470 MCWS-St. Paul 2
 5 Minnesota MN0046744 MCWS-Minneapolis 6

7 Missouri MO0024911 Kansas City, Blue River STP 5
 7 Missouri MO0117960 Moberly East WWTP 8
 7 Missouri MO0050580 Cape Girardeau WWTP 3
 7 Missouri MO0025178 MSD, Bissell Point WWTP 3
 7 Missouri MO0025151 MSD, Lemay WWTP 12
 7 Missouri MO0024929 Kansas City, Westside STP 2
 7 Missouri MO0023221 Macon WWTF 6
 7 Missouri MO0023043 St. Joseph WWTP 2
 7 Missouri MO0023027 Sedalia North WWTP 8

2 New York NY0026131 Ward Island WPCP 77
 2 New York NY0026221 NYCDEP Rockaway WWTP 27
 2 New York NY0026212 NYCDEP 26th Ward 3
 2 New York NY0026204 Newtown Creek WPCP 83
 2 New York NY0026191 NYCDEP-Hunt's Point WPCP 28
 2 New York NY0026182 NYCDEP Coney Island WPCP 4
 2 New York NY0026174 NYCDEP Oakwood Beach WPCP 57
 2 New York NY0026247 North River WPCF 50
 2 New York NY0026158 NYCDEP Bowery Bay WPCP 52
 2 New York NY0026255 Poughkeepsie WPCP 6
 2 New York NY0026115 NYCDEP Jamaica WPCP 7
 2 New York NY0026107 Port Richmond WPCF 36
 2 New York NY0026018 Plattsburgh WPCP 14
 2 New York NY0025984 Watertown WPCP 17
 2 New York NY0025780 Oneida County WPCP 1
 2 New York NY0025151 Carthage West WPCF 0
 2 New York NY0026166 NYCDEP Owls Head WPCP 16
 2 New York NY0027081 Syracuse Metro WWTP 62
 2 New York NY0029173 Waterford WWTP 4
 2 New York NY0029114 City of Oswego, East Side STP 6
 2 New York NY0029050 Glens Falls WWTP 1
 2 New York NY0028339 Frank E. VanLare STP 6

2 New York NY0028240 Saratoga County Sewer District 1 0
2 New York NY0027961 Dunkirk WWTP 1
2 New York NY0026239 Tallman Island WPCP 20
2 New York NY0027545 Clayton Village WTF 2
2 New York NY0027073 Red Hook WPCP 34
2 New York NY0027057 Lockport WWTP 29
2 New York NY0026875 Albany North WWTP 0
2 New York NY0026867 Albany South WWTP 0
2 New York NY0026689 Yonkers Joint WWTP 26
2 New York NY0026336 Niagara Falls WWTP 9
2 New York NY0026310 Newburgh WPCP 12
2 New York NY0026280 North Tonawanda WWTP 13
2 New York NY0027766 Lewiston Master S.D. 1
2 New York NY0020494 Boonville WWTP 1
2 New York NY0023256 Village of Holley STP 1
2 New York NY0022403 Little Falls WWTP 3
2 New York NY0022136 Erie County S.D. #6 1
2 New York NY0022039 Hudson STP 10
2 New York NY0021903 Auburn STP 16
2 New York NY0021873 Medina WWTP 13
2 New York NY0020818 Potsdam WPCP 1
2 New York NY0020516 Schenectady WPCP 2
2 New York NY0020389 Catskill WWTP 5
2 New York NY0020290 Amsterdam WWTP 3
2 New York NY0020117 Gouverneur STP 1
2 New York NY0024414 Binghamton-Johnson City Joint WWTF 0
2 New York NY0020621 Wellsville WWTP 3
2 New York NY0029262 Owego STP 8
2 New York NY0029106 Oswego-West Side STP 1
2 New York NY0028410 Bird Island WWTF 65
2 New York NY0183695 Washington County S.D. 2 11
2 New York NY0087971 Rensselaer County 0
2 New York NY0036706 Ticonderoga S.D. #5 WPCP 2
2 New York NY0033545 Village of Coxsackie STP 3
2 New York NY0031208 Dock Street STP 0
2 New York NY0031194 Massena WWTP 10
2 New York NY0029939 Tupper Lake WPCP 3
2 New York NY0029831 Ogdensburg WWTP 17
2 New York NY0029807 Canastota WPCF 7
2 New York NY0029351 Kingston WWTF 7
2 New York NY0035742 Chemung County-Elmira S.D. STP 11
2 New York NY0029297 Owasco S.D. #1 Overflows 3
2 New York NY0024406 Binghamton CSO 7
2 New York NY0024481 Lewiston ORF 1
2 New York NY0026026 Rensselaer CSO 8
2 New York NY0030899 Watervliet CSO 5

2 New York NY0031046 Cohoes CSO 16
2 New York NY0031429 Utica CSO 82
2 New York NY0033031 Green Island CSO 3
2 New York NY0099309 Troy CSO 49
2 New York NY0248941 City of Mechanicville CSO 3
2 New York NY0025747 Albany CSO 12

5 Ohio OH0024139 City of Bowling Green 1
5 Ohio OH0022471 Deshler WWTP 14
5 Ohio OH0025151 Forest WWTP 3
5 Ohio OH0025135 Findlay Water Pollution Control Center 18
5 Ohio OH0025127 Fayette WWTP 15
5 Ohio OH0025003 City of Elyria WWTP 27
5 Ohio OH0024929 Delphos WWTP 7
5 Ohio OH0024899 Defiance 43
5 Ohio OH0024759 Columbus Grove 4
5 Ohio OH0024741 Columbus-Southerly 2
5 Ohio OH0025291 Fremont WWTP 13
5 Ohio OH0024686 City of Clyde WWTP 4
5 Ohio OH0025364 City of Girard WWTP 5
5 Ohio OH0023981 City of Avon Lake 14
5 Ohio OH0023957 Village of Attica 12
5 Ohio OH0023914 Ashtabula 3
5 Ohio OH0023884 Village of Ansonia WWTP 3
5 Ohio OH0023833 City of Akron 38
5 Ohio OH0023400 City of Wauseon 7
5 Ohio OH0023396 Ohio City 5
5 Ohio OH0022624 Marshallville WWTP 1
5 Ohio OH0028118 City of Willard 2
5 Ohio OH0024732 Columbus-Jackson Pike 29
5 Ohio OH0026565 Village of Mingo Junction 6
5 Ohio OH0027987 Warren 4
5 Ohio OH0027952 Wapakoneta WWTP 4
5 Ohio OH0027910 Van Wert 6
5 Ohio OH0027898 Utica 1
5 Ohio OH0027740 Toledo 38
5 Ohio OH0027511 Steubenville 16
5 Ohio OH0027332 City of Sandusky 17
5 Ohio OH0027197 Portsmouth 10
5 Ohio OH0025160 Fort Recovery WWTP 3
5 Ohio OH0026671 Newark WWTP 26
5 Ohio OH0022322 Put-In-Bay WWTP 3
5 Ohio OH0026522 Middletown WWTP 8
5 Ohio OH0026514 Middleport WWTP 13
5 Ohio OH0026352 Marion Water Pollution Control 3
5 Ohio OH0026263 City of McComb WWTP 3

5 Ohio OH0026069 City of Lima WWTP 19
5 Ohio OH0026026 Lancaster WWTP 31
5 Ohio OH0026018 Lakewood WWTP
5 Ohio OH0025852 Ironton WWTP 9
5 Ohio OH0025771 Hicksville 3
5 Ohio OH0026841 Oak Harbor 9
5 Ohio OH0022578 Green Springs WWTP 1
5 Ohio OH0020192 Village of Bradford 9
5 Ohio OH0020117 North Baltimore 2
5 Ohio OH0020001 Upper Sandusky 7
5 Ohio OH0020338 Village of Paulding 2
5 Ohio OH0020451 City of Milford WWTP 2
5 Ohio OH0020974 Delta WWTP 11
5 Ohio OH0022110 Newton Falls WWTP 28
5 Ohio OH0021831 Montpelier WWTP 4
5 Ohio OH0021725 Pomeroy 13
5 Ohio OH0021491 Bremen 1
5 Ohio OH0021466 McConnelsville 9
5 Ohio OH0021326 Village of Payne WWTP 2
5 Ohio OH0021261 Elmore WWTP 5
5 Ohio OH0021148 Village of Pandora WWTP 10
5 Ohio OH0021105 Hamler WWTP 6
5 Ohio OH0020214 Toronto WWTP 7
5 Ohio OH0021008 Perrysburg Water Pollution Control 4
5 Ohio OH0027481 Springfield STP 58
5 Ohio OH0020940 Arcanum WWTP 14
5 Ohio OH0020893 Napoleon WWTP 3
5 Ohio OH0020851 Bluffton WWTP 20
5 Ohio OH0020664 Crestline WWTP 1
5 Ohio OH0020591 Woodville 18
5 Ohio OH0020559 Village of Caldwell WWTP 23
5 Ohio OH0020524 Village of Swanton 27
5 Ohio OH0020486 Village of Greenwich WWTP 14
5 Ohio OH0021016 Village of Genoa 6
5 Ohio OH0028177 Woodsfield WWTP 5
5 Ohio OH0028185 Wooster 3
5 Ohio OH0028223 City of Youngstown WTP 80
5 Ohio OH0028240 Zanesville WWTP 25
5 Ohio OH0029122 Village of Gibsonburg 3
5 Ohio OH0031062 Euclid 18
5 Ohio OH0043991 Northeast Ohio Regional Sewer District 126
5 Ohio OH0048321 Dunkirk 6
5 Ohio OH0049999 Eastern Ohio Regional Wastewater Authority
5 Ohio OH0052604 City of Norwalk 3
5 Ohio OH0052876 Port Clinton 2
5 Ohio OH0052922 City of Bucyrus 22

5 Ohio OH0052744 City of Fostoria 5
 5 Ohio OH0052949 Tiffin 39
 5 Ohio OH0058971 Luckey STP 4
 5 Ohio OH0058408 Metamora 12
 5 Ohio OH0126268 Lisbon WWTP 9
 5 Ohio OH0094528 Village of Malta 10
 5 Ohio OH0020613 Village of New Boston 2
 5 Ohio OH0105457 Hamilton County Commissioners 182

3 Pennsylvania PA0028223 Corry City Municipal Authority 3
 3 Pennsylvania PA0027014 Altoona City Authority-East 1
 3 Pennsylvania PA0027120 Warren City 4
 3 Pennsylvania PA0027197 Harrisburg Authority 61
 3 Pennsylvania PA0027227 Farrell City 6
 3 Pennsylvania PA0026689 Philadelphia Water Department - Northeast 59
 3 Pennsylvania PA0028207 Reynoldsville Sewer Authority 6
 3 Pennsylvania PA0026671 Philadelphia Water Department - Southwest 83
 3 Pennsylvania PA0036650 Titusville City 5
 3 Pennsylvania PA0037711 Everett Borough Municipal Authority 5
 3 Pennsylvania PA0038920 Burnham Borough 7
 3 Pennsylvania PAG066134 Township of Lett
 3 Pennsylvania PA0027421 Norristown MWA 2
 3 Pennsylvania PA0021571 Marysville Municipal Authority 3
 3 Pennsylvania PA0020346 Punxsutawney Sewer Authority STP 4
 3 Pennsylvania PA0020397 Bridgeport Borough 6
 3 Pennsylvania PA0021237 Newport Borough Municipal Authority 3
 3 Pennsylvania PA0026832 Ellwood City Borough 1
 3 Pennsylvania PA0021539 Williamsburg Borough 1
 3 Pennsylvania PA0026743 Lancaster City 4
 3 Pennsylvania PA0022209 Bedford Borough Municipal Authority 2
 3 Pennsylvania PA0023175 Kane Borough 1
 3 Pennsylvania PA0026174 Franklin City General Authority 4
 3 Pennsylvania PA0026182 Lansdale Borough 2
 3 Pennsylvania PA0026191 Huntington Borough 6
 3 Pennsylvania PA0026662 Philadelphia Water Department - Southeast 35
 3 Pennsylvania PA0021521 Smethport Borough 1
 3 Pennsylvania PA0070386 Shenandoah STP 13
 3 Pennsylvania PA0037818 Saltsburg Borough STP 6
 3 Pennsylvania PA0092355 North Belle Vernon WPCP 16
 3 Pennsylvania PA0070041 Mahanoy City (MCSA) STP 1
 3 Pennsylvania PA0046159 MSA of Houtzdale Borough 1
 3 Pennsylvania PA0043885 Greater Pottsville Area Sewer Authority 54
 3 Pennsylvania PA0043877 Greater Pottsville Area Sewer Authority (West End) 4
 3 Pennsylvania PA0043273 Hollidaysburg Regional WWTP 4
 3 Pennsylvania PA0042234 Kittanning Borough STP 9
 3 Pennsylvania PA0039489 Garrett Boro SIP 2

3 Pennsylvania PA0026107 Wyoming Valley Sewer Authority 54
3 Pennsylvania PA0096229 Marianna-West Bethlehem STP 1
3 Pennsylvania PA0037044 Ford City WTP 3
3 Pennsylvania PA0026492 Scranton WWTF 69
3 Pennsylvania PA0027006 Tamaqua Borough Sewer Authority 16
3 Pennsylvania PA0026981 City of Duquesne STP 4
3 Pennsylvania PA0026921 Hazelton WTP 14
3 Pennsylvania PA0026913 McKeesart WPCP 28
3 Pennsylvania PA0026905 Connellsville STP 16
3 Pennsylvania PA0026891 Charleroi STP 12
3 Pennsylvania PA0038164 Borough of Confluence 2
3 Pennsylvania PA0027057 Williamsport Sanitary Authority Central 3
3 Pennsylvania PA0026476 Coaldale Landsford-Summitt Hill TP 6
3 Pennsylvania PA0026361 Lower Lackawanna Valley Sanitary Authority 24
3 Pennsylvania PA0026352 Coraopolis WPCF 6
3 Pennsylvania PA0026310 Clearfield Municipal Authority 9
3 Pennsylvania PA0026301 Erie City STP 20
3 Pennsylvania PA0026204 Oil City STP 16
3 Pennsylvania PA0026158 Monongahela Valley WWTP 21
3 Pennsylvania PA0026140 Rochester Area Joint Sewer Authority WTP 3
3 Pennsylvania PA0026581 Scottsdale STP 8
3 Pennsylvania PA0027430 Jeannette WWTP 5
3 Pennsylvania PA0036820 Galeton Borough Authority 4
3 Pennsylvania PA0028673 Borough of Gallitzin WWTP 6
3 Pennsylvania PA0028631 Mid-Cameron Authority 1
3 Pennsylvania PA0028436 Elizabeth Borough STP 6
3 Pennsylvania PA0028401 Dravosburg Borough STP 1
3 Pennsylvania PA0027693 Minersville Sewer Authority 10
3 Pennsylvania PA0027651 West Newton Borough STP 13
3 Pennsylvania PA0027626 Kiski Valley STP 32
3 Pennsylvania PA0027022 Altoona West STP 1
3 Pennsylvania PA0027456 Greater Greensboro STP 39
3 Pennsylvania PA0027049 Williamsport Sanitary Authority West Plant 1
3 Pennsylvania PA0027391 Upper Allegheny Joint Sanitary Authority STP 19
3 Pennsylvania PA0027324 Shamokin-Coal Township Joint Sewer Authority 5
3 Pennsylvania PA0027111 New Kensington STP 5
3 Pennsylvania PA0027103 DELCORA Chester STP 26
3 Pennsylvania PA0027090 Lackawanna River Basin Sewer Authority- Throop 25
3 Pennsylvania PA0027081 Lackawanna River Basin Sewer Authority- Clinton 9
3 Pennsylvania PA0027065 Lackawanna River Basin Sewer Authority- Archbald 16
3 Pennsylvania PA0027570 Brush Creek STP 3
3 Pennsylvania PA0026557 Municipal Authority of the City of Sunbury 6
3 Pennsylvania PA0026824 Clairton STP 5
3 Pennsylvania PA0025755 Borough of Freeport STP 6
3 Pennsylvania PA0021610 Blairsville Borough STP 16
3 Pennsylvania PA0024686 Mid Mon Valley WPCP 8

3 Pennsylvania PA0024716 Freeland WWTP 1
3 Pennsylvania PA0024864 Ligonier Boro STP 2
3 Pennsylvania PA0021407 Point Mariah WWTP 6
3 Pennsylvania PA0024511 Redbank Valley Municipal Authority 2
3 Pennsylvania PA0025224 St. Clair S.A. WWTP 7
3 Pennsylvania PA0024490 Rockwood Boro STP 5
3 Pennsylvania PA0021113 Glassport STP 5
3 Pennsylvania PA0025810 Shade-Central City STP 3
3 Pennsylvania PA0020940 Tunkhannock Borough Municipal Authority 2
3 Pennsylvania PA0020702 Fayette City WWTP 2
3 Pennsylvania PA0023469 Honesdale STP 20
3 Pennsylvania PA0025950 City of Monongahela 1
3 Pennsylvania PA0021148 Mt. Pleasant STP 6
3 Pennsylvania PA0023736 Tri-Borough Municipal Authority WWTP 2
3 Pennsylvania PA0023248 Berwick Area Joint Sewer Authority 4
3 Pennsylvania PA0022331 West Elizabeth WWTP 1
3 Pennsylvania PA0022306 Brownsville Municipal Authority-Shady Avenue STP 4
3 Pennsylvania PA0022292 Ebensburg WWTP 2
3 Pennsylvania PA0022241 California Borough STP 3
3 Pennsylvania PA0021814 Mansfield WWTP 4
3 Pennsylvania PA0024589 Leetsdale STP 6
3 Pennsylvania PA0023701 Midland Borough Municipal Authority STP 1
3 Pennsylvania PA0020681 Sewickley WWTP 4
3 Pennsylvania PA0024163 Cambria Township Sewer Authority (Revloc STP) 1
3 Pennsylvania PA0024341 Canton Borough Authority 1
3 Pennsylvania PA0024406 Mt. Carmel Municipal Authority 19
3 Pennsylvania PA0024449 Youngwood Borough STP 2
3 Pennsylvania PA0024481 Meyersdale STP 5
3 Pennsylvania PA0021687 Wellsboro Municipal Authority 2
3 Pennsylvania PA0023558 Ashland Borough 9
3 Pennsylvania PA0025984 Allegheny County Sanitary Authority 21
3 Pennsylvania PA0026069 Latrobe Borough 18
3 Pennsylvania PA0026042 Bethlehem WWTP 3
3 Pennsylvania PA0020613 Waynesbug STP 2
3 Pennsylvania PA0020125 Boro of Monaca STP 6
3 Pennsylvania PAG066102 Braddock Borough 8
3 Pennsylvania PAG066109 McDonald Sewage Authority 20
3 Pennsylvania PA0217611 City of Pittsburgh 217
3 Pennsylvania PAG062201 Easton City 2
3 Pennsylvania PAG062202 Lackawanna River Basin Authority-Moosic 4
3 Pennsylvania PAG064801 Shamokin City 33
3 Pennsylvania PAG066101 Pitcairn Borough 1
3 Pennsylvania PAG066103 Borough of Homestead 1
3 Pennsylvania PAG066104 Bureau of Wilmerding 9
3 Pennsylvania PAG066105 Borough of Rankin 2
3 Pennsylvania PAG066106 Girty's Run JSA, Millvale 9

3 Pennsylvania PAG066107 Township of Stowe 7
 3 Pennsylvania PAG064802 Coal Township 33
 3 Pennsylvania PAG066110 Borough of Crafton 4
 3 Pennsylvania PAG066108 Larimer Avenue CSO 2
 3 Pennsylvania PAG066129 Mayview State Hospital 2
 3 Pennsylvania PAG066130 Export Borough 5
 3 Pennsylvania PAG066131 Freedom Borough 3
 3 Pennsylvania PAG066132 East Rochester Borough 1
 3 Pennsylvania PAG066127 Munhall Boro 4
 3 Pennsylvania PAG066126 Carnegie Borough 1
 3 Pennsylvania PAG066119 Borough of Etna 8
 3 Pennsylvania PAG066111 Emsworth Borough 1
 3 Pennsylvania PAG066112 Borough of McKee Rocks 3
 3 Pennsylvania PAG066113 Borough of Aspinwall 3
 3 Pennsylvania PAG066114 Borough of North Braddock 1
 3 Pennsylvania PAG066115 Ferndale Borough 5
 3 Pennsylvania PAG066116 West View Borough 2
 3 Pennsylvania PAG066128 Borough of Swissvale 1
 3 Pennsylvania PAG066118 Borough of Turtle Creek 10
 3 Pennsylvania PAG066120 Borough of East Pittsburgh 3
 3 Pennsylvania PAG066121 City of Arnold 2
 3 Pennsylvania PAG066122 East Conemaugh Borough 2
 3 Pennsylvania PAG066123 Borough of West Homestead 2
 3 Pennsylvania PAG066124 Dale Borough 7
 3 Pennsylvania PAG066125 Sharpsburg Borough 6
 3 Pennsylvania PAG066117 City of Uniontown 28

 4 Tennessee TN0024210 Chattanooga 18
 4 Tennessee TN0020656 Clarksville 2
 4 Tennessee TN0020575 Nashville 30

 10 Washington WA0024074 City of Mt. Vernon WWTP 2
 10 Washington WA0023973 City of Port Angeles WWTP 5
 10 Washington WA0023744 City of Bellingham WWTP 2
 10 Washington WA0020257 City of Anacortes WWTP 3
 10 Washington WA0024490 Everett WPCF 18
 10 Washington WA0029181 West Point STP 34
 10 Washington WA0024473 Spokane WWTP and CSOs 24
 10 Washington WA0037061 City of Olympia 3
 10 Washington WA0029548 Snohomish WWTP 2
 10 Washington WA0029289 Bremerton WWTP 16
 10 Washington WA0031682 City of Seattle Collection System 110

 3 West Virginia WV0105279 City of Piedmont
 3 West Virginia WV0023205 Charleston 58
 3 West Virginia WV0024473 Marlinton 1

3 West Virginia WV0024392 Keyser 1
3 West Virginia WV0023353 Fairmont 43
3 West Virginia WV0023302 City of Clarksburg 84
3 West Virginia WV0023299 Nitro 7
3 West Virginia WV0023264 City of Moundsville 5
3 West Virginia WV0024732 City of Hinton 6
3 West Virginia WV0023183 Beckley 2
3 West Virginia WV0023175 St. Albans 12
3 West Virginia WV0023167 Martinsburg 1
3 West Virginia WV0023159 Huntington 23
3 West Virginia WV0023124 City of Morgantown 33
3 West Virginia WV0023094 Princeton 1
3 West Virginia WV0022080 Town of Bethany 3
3 West Virginia WV0022063 City of Parsons 4
3 West Virginia WV0023230 Wheeling 211
3 West Virginia WV0029289 City of Belington 7
3 West Virginia WV0084042 Flatwoods-Canoe Run PSD 6
3 West Virginia WV0054500 City of Shinnston 12
3 West Virginia WV0035939 Boone County PSD 1
3 West Virginia WV0033821 City of Logan 12
3 West Virginia WV0024562 City of Wayne 3
3 West Virginia WV0032336 Buckhannon 6
3 West Virginia WV0024589 Welch 28
3 West Virginia WV0028118 Dunbar 16
3 West Virginia WV0028088 Weston 5
3 West Virginia WV0027472 New Martinsville 4
3 West Virginia WV0027324 Monongah 6
3 West Virginia WV0026832 Wellsburg 10
3 West Virginia WV0025461 City of Bridgeport 11
3 West Virginia WV0024848 Town of Davis 3
3 West Virginia WV0021881 Kingwood 3
3 West Virginia WV0033804 Terra Alta
3 West Virginia WV0022039 Point Pleasant 2
3 West Virginia WV0020273 City of Follansbee 5
3 West Virginia WV0021865 Town of Farmington 3
3 West Virginia WV0021857 City of Philippi 13
3 West Virginia WV0021822 Grafton 35
3 West Virginia WV0021792 Petersburg 2
3 West Virginia WV0021750 Marmet 3
3 West Virginia WV0021741 Smithers 3
3 West Virginia WV0020681 Mullens 3
3 West Virginia WV0020621 Montgomery 5
3 West Virginia WV0022004 Richwood 2
3 West Virginia WV0020150 Moorefield 3
3 West Virginia WV0020141 McMechen 3
3 West Virginia WV0020109 Town of West Union 7

3 West Virginia WV0020028 City of Elkins 19
3 West Virginia WV0020648 City of Benwood 9
3 West Virginia WV0023221 Vienna 2
3 West Virginia WV0024449 City of Westover 5
3 West Virginia WV0035637 Cedar Grove 1
3 West Virginia WV0035912 City of Kenova 2
3 West Virginia WV0081434 City of Barrackville 9
3 West Virginia WV0084310 Greater Paw Paw Sanitary District 10
3 West Virginia WV0100901 Nutter Fort 2

5 Wisconsin WIL024767 Milwaukee MSD-Jones Island 120
5 Wisconsin WI0025593 Superior Sewage Disposal System 3